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9
10 **UNITED STATES BANKRUPTCY COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA**

12 **LOS ANGELES DIVISION**

13 In re

14 GIRARDI KEESE, dba, THOMAS VINCENT
15 GIRARDI

16 Debtor.

Chapter 7

Case No. 2:20-bk-21022-BR

17 **JOINDER TO TRUSTEE'S EMERGENCY**
18 **MOTION FOR APPROVAL OF**
19 **SETTLEMENT AND REJECTION OF**
20 **PURPORTED AGREEMENT WITH**
21 **ACTS LAW FIRM**

Date: February 2, 2021

Time: 10:00 a.m.

Place: Courtroom 1668 via ZoomGov

Web Address:

22 <https://cacb.zoomgov.com/j/1614873359>

Meeting ID: 1614873359

Password: 123456

23 Telephone: (646) 828-7666

1 Frantz Law Group, APLC (“Frantz”) hereby joins the Trustee’s *Emergency Motion for Order:*
2 *(1) Approving Compromise with Frantz Law Group, APLC ... (2) Authorizing the Assignment of the*
3 *Estate’s Interest in the Southern California Gas Leak Litigation Free and Clear ... ; and*
4 *(3) Authorizing Rejection of the Assumption and Lien Agreement ...* [ECF 123].

5 In order to avoid burdening the Court with duplicative pleadings and declarations, Frantz
6 hereby incorporates (a) the *Joinder To Trustee’s Emergency Motions For (1) Temporary Restraining*
7 *Order And Issuance Of Order To Show Cause Why A Preliminary Injunction Should Not Issue, And*
8 *(2) Approval Of Settlement And Rejection Of Purported Agreement With ACTS Law Firm*, and (b) the
9 *Supplemental Declaration Of James P. Frantz In Support Of Joinder To Trustee’s Emergency Motion*
10 *For Temporary Restraining Order And Issuance Of An Order To Show Cause Why A Preliminary*
11 *Injunction Should Not Issue*, both of which have been concurrently filed in the adversary proceeding
12 titled *Miller v. Abir Cohen Treyzon Salo, LLP et al.*, Adv. Proc. No. 2:21-ap-01019-BR.

13

14 DATED: January 27, 2021

Respectfully submitted,

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QUINN EMANUEL URQUHART & SULLIVAN, LLP

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By: /s/ Eric Winston

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Kenneth Chiate

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John Shaffer

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Eric Winston

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Razmig Izakelian

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Attorneys for Frantz Law Group, APLC

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
865 S. Figueroa Street, 10th Floor, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled: Joinder To Trustee's Emergency Motion For Approval Of Settlement And Rejection Of Purported Agreement With ACTS Law Firm

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 27, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 27, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Via Email

Boris Treyzon, btreyzon@actslaw.com
Robert Finnerty, rfinnerty@actslaw.com

Via Overnight Mail

ABIR COHEN TREYZON SALO, LLP, a California limited liability partnership 16001 Ventura Boulevard, Suite 200 Encino, CA 91436

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☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/27/21

Date

Razmig Izakelian

Printed Name

/s/ Razmig Izakelian

Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

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